

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

PAUL B. STANLEY,	)	
	)	Civil Action No. 2:08-cv-00969-GLL
Plaintiff,	)	Honorable Gary L. Lancaster
v.	)	
	)	
NEILLY CANVAS GOODS COMPANY,	)	
	)	
Defendant.	)	Electronically Filed

**STIPULATION OF DISMISSAL**

Plaintiff Paul B. Stanley and Defendant Neilly Canvas Goods Company (the “Parties”), pursuant to Rule 41(a) of the Federal Rules of Civil Procedure, hereby stipulate to the dismissal of this action with prejudice, each party to bear his/its own costs.

In support of this stipulation, the Parties represent to the Court that they have reached a confidential and amicable resolution of their dispute that: (a) is fair to all Parties; (b) reasonably resolves a *bona fide* disagreement between the Parties with regard to the merits of Plaintiff’s claims; and (c) demonstrates a good faith intention by the Parties that Plaintiff’s claims for liability and damages be fully and finally resolved, and not re-litigated in whole or in part at any point in the future. The Plaintiff specifically represents that he has consulted with his counsel and that the settlement, resolving his claims related to, *inter alia*, the Fair Labor Standards Act, the Pennsylvania Minimum Wage Act, and the Pennsylvania Wage Payment and Collection Law, is fair.

Counsel for all parties consent to the filing of this Stipulation by counsel for the filing party.

FOR THE PLAINTIFF:

s/ Joseph H. Chivers  
Joseph H. Chivers, PA ID No. 39184  
[jchivers@employmentrightsgroup.com](mailto:jchivers@employmentrightsgroup.com)

EMPLOYMENT RIGHTS GROUP  
Suite 600  
312 Boulevard of the Allies  
Pittsburgh, PA 15222  
412.227.0763 (phone)  
412.281.8481 (fax)

*Attorney for Plaintiff*  
*Paul B. Stanley*

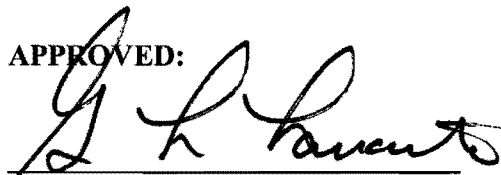
FOR THE DEFENDANT:

s/ Christopher Michalski  
Robert Pritchard, PA ID No. 76979  
[rpritchard@littler.com](mailto:rpritchard@littler.com)  
Christopher Michalski, PA ID No. 93236  
[cmichalski@littler.com](mailto:cmichalski@littler.com)

LITTLER MENDELSON, P.C.  
625 Liberty Avenue, 26th Floor  
Pittsburgh, PA 15222  
412.201.7635/7634 (phone)  
412.456.2377 (fax)

*Attorneys for Defendant*  
*Neilly Canvas Goods Company*

APPROVED:



Honorable Gary L. Lancaster  
United States District Judge

12/12/08